



State of Idaho Idaho National Engineering
& Environmental Laboratory
OVERSIGHT PROGRAM

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Governor
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September 22, 1998

Mr. John Medema
AMWTP EIS Document Manager
DOE Idaho Operations Office
850 Energy Drive, MS 1117
Idaho Falls, ID 83403

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AMWTP OFFICE

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Re: State of Idaho Comments: Advanced Mixed Waste Treatment Project (AMWTP) Draft
Environmental Impact Statement (EIS) (DOE/EIS-0290-D)

Dear Mr. Medema:

The 1995 court settlement between the U.S. Department of Energy (DOE), the U.S. Department of the Navy and the State of Idaho requires DOE to treat all transuranic wastes in Idaho so as to permit ultimate disposal outside the State of Idaho. To support this effort, the settlement also requires DOE to construct a treatment facility at the INEEL for mixed, transuranic and alpha-emitting mixed low-level waste by, December 31, 2002. As required by the National Environmental Policy Act, DOE has presented its analysis of the environmental impacts of the proposed facility and alternatives for public review and comment. The State of Idaho submits the following comments on the above-referenced EIS.

General Comments

The State of Idaho Division of Environmental Quality (DEQ) will separately review proposed facility operations pursuant to its regulatory authorities, including those under the Environmental Protection and Health Act and Hazardous Waste Management Act and implementing rules. The State also notes that under the 1995 consent order referenced in the EIS as the Site Treatment Plan (STP), DEQ must specifically approve any mixed waste shipments from other facilities to the Idaho National Engineering and Environmental Laboratory. In addition, both the 1995 court settlement and the STP impose limits on the treatment of off-site transuranic waste at the INEEL.

The EIS identifies environmental remediation at the INEEL as a source of additional waste quantities. The State of Idaho, DOE and U.S. Environmental Protection Agency would consider use of the AMWTP for treatment of INEEL environmental remediation waste (e.g., waste from the Pit 9 project and other buried waste at the Radioactive Waste Management Complex) under the decision process set forth in the 1991 Federal Facility Agreement and Consent Order.

The EIS should better characterize and discuss projected volumes and management strategies for waste streams that will be generated as a result of AMWTP operations. The document should also include sections on waste minimization and the eventual decontamination and decommissioning of the facility.